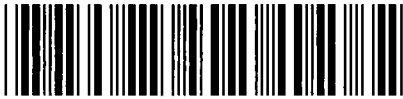




Control Number: 51415



Item Number: 363

Addendum StartPage: 0

PUC DOCKET NO. 51415

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APPLICATION OF SOUTHWESTERN §
ELECTRIC POWER COMPANY FOR §
AUTHORITY TO CHANGE RATES §

2021 APR 15 PM 2:18
PUBLIC UTILITY COMMISSION
OF TEXAS

**EASTMAN CHEMICAL COMPANY'S RESPONSE TO SOUTHWESTERN
ELECTRIC POWER COMPANY'S SECOND REQUESTS FOR INFORMATION**

Eastman Chemical Company ("Eastman") files this Response to Southwestern Electric Power Company's Second Requests for Information to Eastman Chemical Company. Eastman's responses to requests for information shall be made within four (4) business days, making the responses due by April 15, 2021. This response is therefore timely. All parties may treat the answers as if they were filed under oath.

Eastman files these responses without agreeing to the relevancy of the information sought and without waiving its right to object at the time of the hearing to the admissibility of information produced herein.

Eastman Chemical Company
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Eastman Chemical Company
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Respectfully submitted,

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By: 

**ATTORNEYS FOR EASTMAN
CHEMICAL COMPANY**

CERTIFICATE OF SERVICE

I hereby certify that a copy of this document was served by electronic mail, on all parties of record in this proceeding on April 15, 2021, in accordance with the Orders Suspending Rules, issued in Project No. 50664.



Katherine K. Mudge

**SOAH DOCKET NO. 473-21-0538
PUC DOCKET NO. 51415**

**EASTMAN CHEMICAL COMPANY'S RESPONSE TO SOUTHWESTERN ELECTRIC
POWER COMPANY'S SECOND REQUESTS FOR INFORMATION**


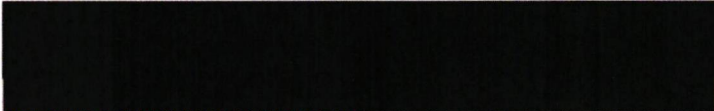
Question No. SWEPCO 2-1:

Please provide all one-line diagrams or other schematics associated with the provision of electric service from the Eastman cogeneration facility to any behind-the-meter customers or facilities on the Eastman campus in Longview, TX. Include voltage levels of the facilities.

- a. Does Eastman utilize any facilities owned or operated by SWEPCO to provide service from the cogeneration facility to any tenants or other customers with Eastman-owned or SWEPCO-owned meters?
- b. If confirmed, please provide the name and voltage level of those facilities.
- c. If confirmed, please provide any details associated with the use of any transmission facilities, including any SPP reservations associated with the use of those facilities.

Response No. SWEPCO 2-1:

See Eastman Response 2-1-Attachment (Highly Sensitive Protected Material) for a diagram. The diagram contains the voltage levels at the substation levels. The voltage level at the distribution level is 12.5kV.

- a. Eastman's tenant load can be served by either the South or North Texas substations. Eastman's South Texas substation is owned by SWEPCO and electricity provided through this substation is used, in part, to provide service from the Eastman cogeneration facility to tenants using Eastman-owned meters.
- b. **HIGHLY SENSITIVE PROTECTED MATERIAL BEGIN**** 
 ****END HIGHLY SENSITIVE
PROTECTED MATERIAL**

- c. SWEPCO has facilitated the use of specific non-EMN owned transmission assets for routing Eastman generated power between Eastman and SWEPCO since Eastman's purchase of the cogeneration facility and North Texas Eastman substation from SWEPCO nearly 20 years ago. At the time of the purchase, Eastman asked SWEPCO to sell the South Texas Eastman substation and associated transmission line; but SWEPCO declined.

HIGHLY SENSITIVE PROTECTED MATERIAL BEGIN*

**** END**

HIGHLY SENSITIVE PROTECTED MATERIAL.

Prepared by or under the direction of the following Sponsor: Anthony Murray

Witness: N/A

**SOAH DOCKET NO. 473-21-0538
PUC DOCKET NO. 51415**

**EASTMAN CHEMICAL COMPANY'S RESPONSE TO SOUTHWESTERN ELECTRIC
POWER COMPANY'S SECOND REQUESTS FOR INFORMATION**

Question No. SWEPCO 2-2:

Please provide any invoices or other billings from Eastman or the Eastman cogeneration facility to any facilities that purchase or procure electricity from the Eastman cogeneration facility in Longview, TX to behind the meter customers or facilities on the Eastman campus for 2017, 2018, 2019, and the test year.

Response No. SWEPCO 2-2:

See Eastman Response to SWEPCO 2-2 Attachment (Highly Sensitive Protected Material) which contains the billings for electricity to tenants located on the Eastman campus that purchase electricity from Eastman in Longview, Texas for 2017, 2018, calendar year 2019, and the test year.

Prepared by or under the direction of the following Sponsor: Anthony Murray

Witness: N/A

SOAH DOCKET NO. 473-21-0538

PUC DOCKET NO. 51415

**EASTMAN CHEMICAL COMPANY'S RESPONSE TO SOUTHWESTERN ELECTRIC
POWER COMPANY'S SECOND REQUESTS FOR INFORMATION**

Question No. SWEPCO 2-3:

Please provide customer usage data associated with any purchases or sales of electricity from the Eastman cogeneration facility to behind the meter customers or facilities on the Eastman campus, including peak monthly demand data by customer or facility, with hour and date, as well as monthly energy usage, by customer, for 2017, 2018, 2019, and the test year.

Response No. SWEPCO 2-3:

Eastman does not maintain hour and date data for peak monthly demand by customer. See the Quantity Column in Eastman Response SWEPCO 2-2 Attachment for the respective tenants' customer usage data that Eastman maintains in the regular course of business by customer for 2017, 2018, 2019, and the test year.

Prepared by or under the direction of the following Sponsor: Anthony Murray

Witness: N/A

**SOAH DOCKET NO. 473-21-0538
PUC DOCKET NO. 51415**

**EASTMAN CHEMICAL COMPANY'S RESPONSE TO SOUTHWESTERN ELECTRIC
POWER COMPANY'S SECOND REQUESTS FOR INFORMATION**

Question No. SWEPCO 2-4:

Does Eastman have reverse power relaying in place that would prevent the loads on site from taking energy from the SWEPCO system when the BTM generation experiences a forced outage such that it cannot cover the entire load?

Response No. SWEPCO 2-4:

No. To address situations where the BTM generation experiences a forced outage, Eastman Cogeneration L.P. negotiated and executed a Contract for Electric Service for Supplementary Power, Backup Power, Maintenance Power, and As-available Standby Power on November 20, 2008 ("Stand-by Contract"). The Stand-by Contract identifies the terms, conditions, and rates to be used when or if Eastman Cogeneration requires electricity from SWEPCO in a situation in which Eastman's Cogeneration experiences a forced outage.

Prepared by or under the direction of the following Sponsor: Anthony Murray

Witness: N/A

**EASTMAN CHEMICAL COMPANY'S RESPONSE TO SOUTHWESTERN ELECTRIC
POWER COMPANY'S SECOND REQUESTS FOR INFORMATION**

Question No. SWEPCO 2-5:

In the event SWEPCO placed reverse power relaying to prevent any unapproved withdrawal of energy from the SWEPCO system:

- a. Confirm or Deny -- Would the sudden loss of power to any of the loads create a danger to any of the employees on the facility?
 - i. If confirmed, how long would Eastman need SWEPCO to provide back-up power for Eastman to safely shut down its facilities?
- b. Confirm or Deny - Would the sudden loss of power to any of the loads create a danger to the public outside the facility?
 - i. If confirmed, how long would Eastman need SWEPCO to provide back-up power for Eastman to safely shut down its facilities?
- c. Confirm or Deny – Would the sudden loss of power to any of the loads create a large financial loss of product.
 - i. If confirmed, how long would Eastman need in terms of notice to avoid this loss of product?

Response No. SWEPCO 2-5:

- a. Assuming SWEPCO performed its obligations under the Stand-by Contract, Eastman would not expect any danger to be posed to any employees by an unexpected, forced outage of the Eastman cogeneration facilities.
 - i. Eastman does not have an estimate for the duration of the use of SWEPCO-provided stand-by power in a situation of forced outages; however SWEPCO should have data for stand-by power usage in situations of retail BTMG forced outages.
- b. Assuming SWEPCO performed its obligations under the Stand-by Contract, Eastman would not expect any danger to be posed to the public outside the Eastman facility by an unexpected, forced outage of the Eastman cogeneration facilities.
 - i. Eastman does not have an estimate for the duration of time that Eastman would need for SWEPCO to provide back-up power for Eastman to safely shut down its facilities as the estimate would depend on the specific circumstances of the forced outage. However, since Eastman Cogeneration has the Stand-by Contract with the

SWEPCO, it would follow any and all terms and conditions related to use of the back-up power until the retail BTMG forced outage is over.

- c. Assuming SWEPCO performed its obligations under the Stand-by Contract, Eastman would not expect any significant financial loss of product by an unexpected, forced outage of the Eastman cogeneration facilities.
 - i. Eastman does not have an estimate as to how long would Eastman need in terms of notice to avoid this loss of product as the response is dependent on the specific circumstances of the outage.

Prepared by or under the direction of the following Sponsor: Anthony Murray

Witness: N/A

**SOAH DOCKET NO. 473-21-0538
PUC DOCKET NO. 51415**

**EASTMAN CHEMICAL COMPANY'S RESPONSE TO SOUTHWESTERN ELECTRIC
POWER COMPANY'S SECOND REQUESTS FOR INFORMATION**

Question No. SWEPCO 2-6:

Is the Eastman generating facility registered as a resource with the SPP RTO? If so, why?

Response No. SWEPCO 2-6:

Yes. Eastman's generating facility is required to be registered as a resource with SPP RTO under PURPA and PURA.

Prepared by or under the direction of the following Sponsor: Anthony Murray

Witness: N/A

**SOAH DOCKET NO. 473-21-0538
PUC DOCKET NO. 51415**

**EASTMAN CHEMICAL COMPANY'S RESPONSE TO SOUTHWESTERN ELECTRIC
POWER COMPANY'S SECOND REQUESTS FOR INFORMATION**

Question No. SWEPCO 2-7:

When operating, is the Eastman Generator interconnected and synchronized with the SPP Transmission System? If so, why?

Response No. SWEPCO 2-7:

Yes, the Eastman Cogeneration generator is interconnected at SWEPCO's East Texas Switching Station ("SWEPCO East TX Station"). To the extent that the SWEPCO East TX Station is interconnected and synchronized with the SPP Transmission System, then, when operating, the Eastman Cogeneration generator is interconnected and synchronized with the SPP Transmission System. The Eastman Cogeneration generator is interconnected with the SPP Transmission System because such interconnection is necessary to distribute electricity and to receive electricity that Eastman Cogeneration purchases from SWEPCO.

Prepared by or under the direction of the following Sponsor: Anthony Murray

Witness: N/A

**SOAH DOCKET NO. 473-21-0538
PUC DOCKET NO. 51415**

**EASTMAN CHEMICAL COMPANY'S RESPONSE TO SOUTHWESTERN ELECTRIC
POWER COMPANY'S SECOND REQUESTS FOR INFORMATION**

Question No. SWEPCO 2-8:

When the load at the Eastman facility is being served using the Eastman Generation, is it interconnected and synchronized with the SPP Transmission System? If so, why?

Response No. SWEPCO 2-8:

The Eastman Chemical Company facility is interconnected and synchronized with the Eastman Cogeneration generator. Please see Response to SWEPCO 2-7 with respect to the Eastman Cogeneration generator interconnection and synchronization.

Prepared by or under the direction of the following Sponsor: Anthony Murray

Witness: N/A

**SOAH DOCKET NO. 473-21-0538
PUC DOCKET NO. 51415**

**EASTMAN CHEMICAL COMPANY'S RESPONSE TO SOUTHWESTERN ELECTRIC
POWER COMPANY'S SECOND REQUESTS FOR INFORMATION**

Question No. SWEPCO 2-9:

Confirm or deny if South Texas Eastman connected load would remain online and connected to Eastman's generation if SPP ordered SWEPCO to disconnect both North Texas Eastman and South Texas Eastman yards from the SPP Transmission System?

Response No. SWEPCO 2-9:

Denied. However, as noted in Response to SWEPCO 2-1(c), this situation is caused by SWEPCO's refusal to sell the South Texas substation on the Eastman property. **HIGHLY SENSITIVE PROTECTED MATERIAL BEGIN***

****END HIGHLY SENSITIVE PROTECTED MATERIAL**

Prepared by or under the direction of the following Sponsor: Anthony Murray

Witness: N/A